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SCOPE OF WORK FOR
STREAMLINED REMEDIAL INVESTIGATION AND FEASIBILITY STUDY
AT
SAUGET AREA 2 SITE
SAUGET AND CAHOKIA, ILLINOIS

PURPOSE:

The purpose of this Scope of Work (SOW) is to set forth requirements for the preparation of a streamlined Remedial Investigation and Feasibility Study (RI/FS). The RI shall evaluate the nature and extent of contamination resulting from the disposal/deposition of contaminants in Sauget Area 2 (Sites O, P, Q, R and S) and also assess the risk from this contamination on human health and the environment. The FS Report shall evaluate alternatives for addressing the impact to human health and/or the environment from the contamination at Sauget Area 2. The RI and FS Reports shall be conducted, at a minimum, consistent with the "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (U.S. EPA, Office of Emergency and Remedial Response, October, 1988) and any other guidances that U.S. EPA uses in conducting a RI/FS, as well as any additional requirements in the administrative order. The Respondents shall furnish all personnel, materials, and services necessary for, or incidental to, performing the RI/FS at the Sauget Area 2 Site, except as otherwise specified herein.

At the completion of the RI/FS, U.S. EPA will be responsible for the selection of a Site remedy and will document this selection in a Record of Decision (ROD). The remedial action selected by U.S. EPA will meet the cleanup standards specified in CERCLA Section 121. That is, the selected remedial action will be protective of human health and the environment, will be in compliance with, or include a waiver of, applicable or relevant and appropriate requirements of other laws, will be cost-effective, will utilize permanent solutions and alternative treatment technologies or resource recovery technologies, to the maximum extent practicable, and will address the statutory preference for treatment as a principal element. The final RI/FS reports, as adopted by U.S. EPA, and the risk evaluation/assessment will, with the administrative record, form the basis for the selection of the site's remedy and will provide the information necessary to support the development of the ROD.

As specified in CERCLA Section 104(a)(1), as amended by SARA, U.S. EPA will provide oversight of the Respondents' activities throughout the RI/FS, including all field sampling activities. The Respondents will support U.S. EPA's initiation and conduct of activities related to the implementation of oversight activities.

SCOPE:

The tasks to be completed as part of this RI/FS are:

Task 1. RI/FS Support Sampling Plan

Task 2. Remedial Investigation
Task 3. RI/FS Report
Task 4. Progress Reports

TASK 1: RI/FS SUPPORT SAMPLING PLAN

Within 30 calendar days of the effective date of the Administrative Order, Respondents shall submit a Sampling Plan to U.S. EPA and Illinois EPA that addresses all data acquisition activities. The objective of this RI/FS support sampling is to further determine the extent of contamination at the Site beyond that already identified by previous site investigations. The plan shall contain a description of equipment specifications, required analyses, sample types, and sample locations and frequency. The plan shall address specific hydrologic, hydrogeologic, and air transport characterization methods including, but not limited to, geologic mapping, geophysics, field screening, drilling and well installation, flow determination, and soil/water/sediment/waste sampling to determine extent of contamination.

Respondents shall identify the data requirements of specific remedial technologies that may be necessary to evaluate remedial activities in the RI/FS and the Respondents shall provide a schedule stating when events will take place and when deliverables will be submitted.

The RI/FS Support Sampling Plan shall include the following information:

A. Site Background

A brief summary of the Site location, general Site physiography, hydrology and geology shall be included. A summary description of the data already available shall be included which will highlight the areas of known contamination and the levels detected. Tables shall be included to display the minimum and maximum levels of detected contaminants across the Site.

B. Data Gap Description

Respondents shall make an analysis of the currently available data to determine the areas of the Site which require additional data in order to define the extent of contamination for purposes of implementing a remedial action. A description of the number, types, and locations of additional samples to be collected shall be included in this section of the sampling plan.

Descriptions of the following activities shall also be included:

i. Waste Characterization

Respondents shall include a program for characterizing the waste materials at the Site. This shall include an analysis of current information/data on past disposal practices at the Site. For buried wastes, test pits/trenches and deep soil borings shall be proposed in the plan to determine waste depths and volume and to determine the extent of cover over fill areas. Soil gas surveys shall also be proposed for the areas on and around fill areas of the site. Geophysical characterization methods, such as ground penetrating radar or magnetometry, to further delineate potential "hot spot" drum removal areas shall also be included.

ii. Hydrogeologic Investigation

The plan shall include the degree of hazard, the mobility of pollutants, discharges/recharge areas, regional and local flow direction and quality, and local uses of groundwater. The plan shall also develop a strategy for determining horizontal and vertical distribution of contaminants and may include other hydraulic tests such as slug tests, and grain size analysis to assist in determining future potential remediation options. Upgradient samples shall be included in the plan.

iii. Soils and Sediments Investigation

Respondents shall include a program to determine the extent of contamination of surface and subsurface soils at the Site. The plan shall also determine the extent, including depth, of contamination of sediments in the Mississippi River. Samples of any leachate from the areas described as fill shall also be collected.

iv. Surface Water Investigation

Respondents shall include a program to determine the areas of surface water contamination in the Mississippi River.

v. Air Investigation

Respondents shall include a program to determine the extent of atmospheric contamination from the various source areas at the Site. The program shall address the tendency of the substances identified through the waste characterization (i.e., PCBs) to enter the atmosphere, local wind patterns, and the degree of hazard.

vi. Ecological Assessment

Respondents shall include a plan for collecting data for the purpose of assessing the impact, if any, to aquatic and terrestrial ecosystems within and adjacent to Sauget Area 2, including within the Mississippi River, as

a result of the disposal, release and migration of contaminants. The plan shall include a description of the ecosystems affected, an evaluation of toxicity, an assessment of endpoint organisms, and the exposure pathways. The plan shall also include a description of any toxicity testing or trapping to be included as part of the assessment. The ecological assessment shall be conducted in accordance with U.S. EPA guidance, including Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments (June 5, 1997; EPA 540-R-97-006).

vii. Pilot Tests

Respondents shall include a program for any pilot test(s) necessary to determine the implementability and effectiveness of technologies where sufficient information is not otherwise available.

C. Sampling Procedures

Respondents shall include a description of the depths of sampling, parameters to be analyzed, equipment to be used, decontamination procedures to be followed, sample quality assurance, data quality objectives and sample management procedures to be utilized in the field. All sampling and analyses performed shall conform to U.S. EPA direction, approval, and guidance regarding sampling, quality assurance/quality control ("QA/QC"), data validation, and chain of custody procedures. Respondents shall ensure that the laboratory used to perform the analyses participates in a QA/QC program that complies with U.S. EPA guidance.

Upon request by U.S. EPA, Respondents shall have such a laboratory analyze samples submitted by U.S. EPA for quality assurance monitoring. Respondents shall provide to U.S. EPA the QA/QC procedures followed by all sampling teams and laboratories performing data collection and/or analysis. Respondents shall also ensure provision of analytical tracking information consistent with OSWER Directive No. 9240.0-2B, Extending the Tracking of Analytical Services to PRP-Lead Superfund Sites.

Upon request by U.S. EPA, Respondents shall allow U.S. EPA or its authorized representatives to take split and/or duplicate samples of any samples collected by Respondents or their contractors or agents. Respondents shall notify U.S. EPA not less than 10 business days in advance of any sample collection activity. U.S. EPA shall have the right to take any additional samples that it deems necessary.

D. Health and Safety Plan

Respondents shall prepare a Site safety plan which is designed to protect on-site personnel, area residents and nearby workers from physical, chemical and all other hazards posed by this sampling event. The safety plan shall develop the performance levels and criteria necessary to address the following areas:

- General requirements
- Personnel
- Levels of protection
- Safe work practices and safe guards
- Medical surveillance
- Personal and environmental air monitoring
- Personal hygiene
- Decontamination - personal and equipment
- Site work zones
- Contaminant control
- Contingency and emergency planning (including response to fires/explosions)
- Logs, reports and record keeping

The safety plan shall, at a minimum, follow U.S. EPA guidance document Standard Operating Safety Guides (Publication 9285.1-03, PB92-963414, June 1992), and all OSHA requirements as outlined in 29 CFR 1910.

E. Schedule

Respondents shall include a schedule which identifies timing for initiation and completion of all tasks to be completed as part of this RI/FS Support Sampling Plan.

TASK 2: REMEDIAL INVESTIGATION

Respondents shall conduct the Remedial Investigation according to the U.S. EPA approved Sampling Plan and schedule. Respondents shall coordinate activities with U.S. EPA's Remedial Project Manager (RPM). Respondents shall provide the RPM with all laboratory data.

TASK 3: REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS)

Within 180 calendar days of the collection of the last field sample as part of the Remedial Investigation (Task 2) (as designated by the U.S. EPA RPM), Respondents shall submit to U.S. EPA for approval a draft RI/FS report addressing all of Sauget Area 2. The RI/FS shall be consistent with the administrative order and this SOW. The RI/FS shall be completed in accordance with the following requirements:

1 Executive Summary

2 Site Characterization

2.1 Site Description and Background
- 2.1.1 Site Location and Physical Setting
- 2.1.2 Present and Past Facility Operations and Disposal Practices
- 2.1.2 Geology/Hydrology/Hydrogeology
- 2.1.3 Current and past groundwater usage in the site area
- 2.1.4 Surrounding Land Use and Populations
- 2.1.5 Sensitive Ecosystems
- 2.1.6 Meteorology/Climatology

2.2 Groundwater Fate and Transport

- Contaminant Characteristics
- Groundwater Fate and Transport Processes
- Groundwater Contaminant Migration Trends
- Groundwater Modeling

2.3 Previous Removal/Remedial Actions
2.4 Source, Nature, and Extent of Contamination
2.5 Analytical Data
2.6 Human Health Risk Assessment
2.7 Ecological Risk Assessment

3 Identification of Remedial Action Objectives

3.1 Determination of Remedial Action Scope
3.2 Determination of Remedial Action Schedule
3.3 Identification of and Compliance with ARARs

4 Identification and Analysis of Remedial Action Alternatives

5 Detailed Analysis of Alternatives

5.1 Effectiveness
- 5.1.1 Overall Protection of Public Health and the Environment
- 5.1.2 Compliance with ARARs and Other Criteria, Advisories, and Guidance
- 5.1.3 Long-Term Effectiveness and Permanence
- 5.1.4 Reduction of Toxicity, Mobility, or Volume Through Treatment
- 5.1.5 Short-Term Effectiveness

5.2 Implementability
- 5.2.1 Technical Feasibility
- 5.2.2 Administrative Feasibility
- 5.2.3 Availability of Services and Materials
- 5.2.4 State and Community Acceptance

5.3 Cost
- 5.3.1 Direct Capital Costs
- 5.3.2 Indirect Capital Costs
- 5.3.3 Long-Term Operation and Maintenance

6 Comparative Analysis of Remedial Action Alternatives

7 Schedule for RI/FS Submission

RI/FS Outline:

1 Executive Summary

The Executive Summary shall provide a general overview of the contents of the RI/FS. It shall contain a brief discussion of the Site and the current and/or potential threat posed by conditions at the Site.

2 Site Characterization

The RI/FS shall summarize available data on the physical, demographic, and other characteristics of the Site and the surrounding areas. Specific topics which shall be addressed in the site characterization are detailed below. The site characterization shall concentrate on those characteristics necessary to evaluate and select an appropriate remedy.

2.1 Site Description and Background

The site description includes current and historical information. The following types of information shall be included, where available and as appropriate, to the site-specific conditions and the scope of the remedial action.

2.1 Site Description and Background

- 2.1.1 Site Location and Physical Setting
- 2.1.2 Present and Past Facility Operations and Disposal Practices

2.1.2 Geology/Hydrology/Hydrogeology
2.1.3 Current and past groundwater usage in the site area
2.1.4 Surrounding Land Use and Populations
2.1.5 Sensitive Ecosystems
2.1.6 Meteorology/Climatology

2.2 Previous Removal Actions

The site characterization section shall also describe any previous removal and remedial actions at the Site. Previous information, if relevant, shall be organized as follows:

* The scope and objectives of the previous removal action(s)
* The amount of time spent on the previous removal action(s)
* The nature and extent of hazardous substances, pollutants, or contaminants treated or controlled during the previous removal action(s) (including all monitoring conducted)
* The technologies used and/or treatment levels used for the previous removal action(s).

2.3 Source, Nature and Extent of Contamination

This section shall summarize the available site characterization data for Sauget Area 2, including the locations of the hazardous substances, pollutants, or contaminants; the quantity, volume, size or magnitude of the contamination; and the physical and chemical attributes of the hazardous pollutants or contaminants.

2.4 Analytical Data

This section shall present the available data, including, but not limited to, soil, groundwater, surface water, sediments, and air. This section should discuss any historical data gaps that were identified, and the measures taken to develop all necessary additional data.

2.5 Human Health Risk Assessment

The risk assessment shall focus on actual and potential risks to persons coming into contact with on-site contaminants as well as risks to the surrounding residential and industrial worker populations from exposure to contaminated soils, sediments, surface water, air, and ingestion of contaminated organisms in surrounding impacted ecosystems. Reasonable maximum estimates of exposure shall be defined for both current land use conditions and reasonable future land use conditions. It shall use data from the Site to identify the chemicals of concern, provide an estimate of how and to what extent human receptors might be exposed to these chemicals, and provide an

assessment of the health effects associated with these chemicals. The evaluation shall project the potential risk of health problems occurring if no cleanup action is taken at the Site and establish target action levels for COCs (carcinogenic and non-carcinogenic). The risk evaluation shall be conducted in accordance with U.S. EPA guidance including, at a minimum: Risk Assessment Guidance for Superfund (RAGS) (EPA/540/1-89/002, December 1989) and RAGS Part D (EPA 540/R/97/033, January 1998). The risk assessment shall also include the following elements:

- Hazard Identification (sources). The Respondents shall review available information on the hazardous substances present at the Site and identify the major contaminants of concern.

- Dose-Response Assessment. Contaminants of concern should be selected based on their intrinsic toxicological properties.

- Conceptual Exposure/Pathway Analysis.

- Characterization of Site and Potential Receptors.

- Exposure Assessment. Respondents shall develop reasonable maximum estimates of exposure for both current land use conditions and potential land use conditions at the Site.

- Risk Characterization.

- Identification of Limitations/Uncertainties.

2.6 Ecological Risk Assessment

The ecological risk assessment shall be conducted in accordance with U.S. EPA guidance including, at a minimum: Ecological Risk Assessment Guidance for Superfund, Process for Designing and Conducting Ecological Risk Assessments, (EPA/540/R/97/006, June 1997).

The ecological risk assessment shall describe the data collection activities conducted as part of Task 1(B)(vi) as well as the following information:

- Hazard Identification (sources). The Respondents shall review available information on the hazardous substances present at and adjacent to the Site and identify the major contaminants of concern.

- Dose-Response Assessment. Contaminants of concern should be selected based on their intrinsic toxicological properties.

- Prepare Conceptual Exposure/Pathway Analysis.

- Characterization of Site and Potential Receptors.

- Select Chemicals, Indicator Species, and End Points. In preparing the assessment, the Respondents shall select representative chemicals, indicator species (species that are especially sensitive to environmental contaminants), and end points on which to concentrate.

- Exposure Assessment. The exposure assessment will identify the magnitude of actual exposures, the frequency and duration of these exposures, and the routes by which receptors are exposed. The exposure assessment shall include an evaluation of the likelihood of such exposures occurring and shall provide the basis for the development of acceptable exposure levels.

- Toxicity Assessment/Ecological Effects Assessment. The toxicity and ecological effects assessment will address the types of adverse environmental effects associated with chemical exposures, the relationships between magnitude of exposures and adverse effects, and the related uncertainties for contaminant toxicity (e.g., weight of evidence for a chemical's carcinogenicity).

- Risk Characterization. During risk characterization, chemical-specific toxicity information, combined with quantitative and qualitative information from the exposure assessment, shall be compared to measured levels of contaminant exposure levels and the levels predicted through environmental fate and transport modeling. These comparisons shall determine whether concentrations of contaminants at or near the Site are affecting or could potentially affect the environment.

- Identification of Limitations/Uncertainties. Respondents shall identify critical assumptions (e.g., background concentrations and conditions) and uncertainties in the report.

3 Identification of Remedial Action Objectives

The RI/FS shall develop remedial and, where appropriate, removal action objectives, taking into consideration the following factors:

* Prevention or abatement of actual or potential exposure to nearby human populations, (including workers), animals, or the food chain from hazardous substances., pollutants., or contaminants;,

* Prevention or abatement of actual or potential contamination of drinking water supplies and ecosystems;

* Stabilization or elimination of hazardous substances in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release;

* Treatment or elimination of hazardous substances, pollutants, or contaminants in soils or sediments that may migrate;

* Elimination of threat of fire or explosion;

* Acceptable chemical-specific contaminant levels, or range of levels, for all exposure routes.

* Mitigation or abatement of other situations or factors that may pose threats to public health, welfare, or the environment.

3.1 Determination of Remedial Action Scope

The RI/FS shall define the broad scope and specific short-term and long-term objectives of the remedial action and address the protectiveness of the remedial action.

3.2 Determination of Remedial Action Schedule

The general schedule for remedial action and, where appropriate, removal activities shall be developed, including both the start and completion time for the remedial action.

3.3 Identification of and Compliance with ARARs

The RI/FS shall identify all applicable, relevant and appropriate requirements at both the federal and state levels that will apply to the remedial action. The RI/FS shall also describe how the ARARs will be met.

4 Identification and Analysis of Remedial Action Alternatives

Based on the analysis of the nature and extent of contamination and on the cleanup objectives developed in the previous section, a limited number of alternatives appropriate for addressing the remedial action objectives shall be identified and assessed. Whenever practicable, the

alternatives shall also consider the CERCLA preference for treatment over conventional containment or land disposal approaches.

The use of presumptive remedy guidance, if appropriate and applicable to any of the disposal areas of the Sauget Area 2 Site, may also provide an immediate focus to the identification and analysis of alternatives. This guidance includes, but is not limited to: Implementing Presumptive Remedies (EPA 540-R-97-029, October 1997). Presumptive remedies involve the use of remedial technologies that have been consistently selected at similar sites or for similar contamination.

A limited number of alternatives, including any identified presumptive remedies, shall be selected for detailed analysis. Each of the alternatives shall be described with enough detail so that the entire treatment process can be understood. Technologies that may apply to the media or source of contamination shall be listed in the RI/FS.

The preliminary list of alternatives to address the Sauget Area 2 Site shall consist of, but is not limited to, treatment technologies (i.e., thermal methods), removal and off-site treatment/disposal, removal and an on-site disposal, and in-place containment for soils, sediments and wastes.

5 Detailed Analysis of Alternatives

Defined alternatives are evaluated against the short- and long-term aspects of three broad criteria: effectiveness, implementability, and cost.

5.1 Effectiveness

The effectiveness of an alternative refers to its ability to meet the objective regarding the scope of the remedial action. The "Effectiveness" discussion for each alternative shall evaluate the degree to which the technology would mitigate threats to public health and the environment. Criteria to be considered include:

5.1.1 Overall Protection of Public Health and the Environment

How well each alternative protects public health and the environment shall be discussed in a consistent manner. Assessments conducted under other evaluation criteria, including long-term effectiveness and permanence, short-term effectiveness, and compliance with ARARs shall be included in the discussion. Any unacceptable short-term impacts shall be identified. The discussion shall focus on how each alternative achieves adequate protection and describe how the alternative will reduce, control, or eliminate risks at the Site through the use of treatment, engineering, or institutional controls.

5.1.2 Compliance with ARARs and Other Criteria, Advisories, and Guidance

The detailed analysis shall summarize which requirements are applicable or relevant and appropriate to an alternative and describe how the alternative meets those requirements. A summary table may be employed to list potential ARARs. In addition to ARARs, other Federal or State advisories, criteria, or guidance to be considered (TBC) may be identified.

5.1.3 Long-Term Effectiveness and Permanence

This evaluation assesses the extent and effectiveness of the controls that may be required to manage risk posed by treatment of residuals and/or untreated wastes at the Site. The following components shall be considered for each alternative: magnitude of risk, and, adequacy and reliability of controls.

5.1.4 Reduction of Toxicity, Mobility, or Volume Through Treatment

Respondents' analysis shall address U.S. EPA's policy of preference for treatment including an evaluation based upon the following subfactors for a particular alternative:

* The treatment process(es) employed and the material(s) it will treat
* The amount of the hazardous or toxic materials to be destroyed or treated
* The degree of reduction expected in toxicity, mobility, or volume
* The degree to which treatment will be irreversible
* The type and quantity of residuals that will remain after treatment
* Whether the alternative will satisfy the preference for treatment

5.1.5 Short-Term Effectiveness

The short-term effectiveness criterion addresses the effects of the alternative during implementation before the remedial objectives have been met. Alternatives shall also be evaluated with respect to their effects on human health and the environment following implementation. The following factors shall be addressed as appropriate for each alternative:

* Protection of the Community
* Protection of the Workers
* Environmental Impacts
* Time Until Response Objectives are Achieved

5.2 Implementability

This section is an assessment of the implementability of each alternative in terms of the technical and administrative feasibility and the availability of the goods and services necessary for each alternative's full execution. The following factors shall be considered under this criterion:

5.2.1 Technical Feasibility

The degree of difficulty in constructing and operating the technology; the reliability of the technology, the availability of necessary services and materials; the scheduling aspects of implementing the alternatives during and after implementation; the potential impacts on the local community during construction operation; and the environmental conditions with respect to set-up and construction and operation shall be described. Potential future removal actions shall also be discussed. The ability to monitor the effectiveness of the alternatives may also be described.

5.2.2 Administrative Feasibility

The administrative feasibility factor evaluates those activities needed to coordinate with other offices and agencies. The administrative feasibility of each alternative shall be evaluated, including the need for off-site permits, adherence to applicable non-environmental laws, and concerns of other regulatory agencies. Factors that shall be considered include, but are not limited to, the following: statutory limits, permits and waivers.

5.2.3 Availability of Services and Materials

The RI/FS must determine if off-site treatment, storage, and disposal capacity, equipment, personnel, services and materials, and other resources necessary to implement an alternative shall be available in time to maintain the remedial schedule.

5.2.4 State and Community Acceptance

State and Community Acceptance will be considered by U.S. EPA before a final remedial action is decided upon. Respondents need only mention in the RI/FS that U.S. EPA will consider and address State and community acceptance of an alternative when making a recommendation and in the final selection of the alternative in the ROD.

5.3 Cost

Each alternative shall be evaluated to determine its projected costs. The evaluation should compare each alternative's capital and operation and maintenance costs. The present worth of alternatives should be calculated.

5.3.1 Direct Capital Costs

Costs for construction, materials, land, transportation, analysis of samples, treatment shall be presented.

5.3.2 Indirect Capital Costs

Cost for design, legal fees, permits shall be presented.

5.3.3 Long-Term Operation and Maintenance Costs

Costs for maintenance and long-term monitoring shall be presented.

6 Comparative Analysis of Remedial Action Alternatives

Once remedial action alternatives have been described and individually assessed against the evaluation criteria described in Section 5, above, a comparative analysis shall be conducted to evaluate the relative performance of each alternative in relation to each of the criteria. The purpose of the analysis shall be to identify advantages and disadvantages of each alternative relative to one another so that key trade offs that would affect the remedy selection can be identified.

7 Schedule for RI/FS Submission

Within 30 calendar days following the collection of the last field sample as part of the Remedial Investigation (Task 2), Respondents shall present at a meeting the alternatives to undergo a more detailed analysis. A draft RI/FS shall be submitted to U.S. EPA and Illinois EPA within 180 calendar days following the collection of the last field sample as part of the Remedial Investigation (Task 2). The amended RI/FS, if required, shall be submitted to U.S. EPA and Illinois EPA within 21 calendar days of the receipt of U.S. EPA's comments on the draft RI/FS.

Following U.S. EPA approval of the RI/FS, U.S. EPA will issue a Proposed Plan to the public wherein U.S. EPA will propose one, or a combination, of the alternatives evaluated in the FS. Public comments will be solicited and evaluated before U.S. EPA makes a final decision on a remediation plan. The final decision will be documented in the ROD for the Sauget Area 2 Site.

TASK 6: PROGRESS REPORTS

Respondents shall submit a monthly written progress report to U.S. EPA and Illinois EPA concerning actions undertaken pursuant to the Order and this SOW, beginning 30 calendar days after the effective date of the Order, until termination of the Order, unless otherwise directed in writing by the RPM. These reports shall describe all significant developments during the preceding period, including the work performed and any problems encountered, analytical data received during the reporting period, and developments anticipated during the next reporting period, including a schedule of work to be performed, anticipated problems, and planned resolutions of past or anticipated problems.

SCHEDULE FOR MAJOR DELIVERABLES

Deliverable	Deadline
TASK 1: Draft RI/FS Support Sampling Plan	30 calendar days after effective date of Order
TASK 1: Final RI/FS Support Sampling Plan	21 calendar days after receipt of U.S. EPA comments
TASK 3: Draft RI/FS Report	180 calendar days following collection of last field sample as part of RI (Task 2). To be designated by RPM
TASK 3: Final RI/FS Report	21 calendar days after receipt of U.S. EPA comments on draft RI/FS Report
TASK 4: Monthly Progress Reports	10th business day of each month (Commencing 30 days after effective date of Order)
Miscellaneous Documents	In accordance with submittal date provided by RPM